

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION**

CASE NO. _____

AARON HACKMAN,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES LLC,

Defendant.

_____ /

**DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S
NOTICE OF REMOVAL**

COMES NOW, Equifax Information Services LLC ("Equifax"), and files this Notice of Removal pursuant to 28 U.S.C. §1446(a) and in support thereof would respectfully show the Court as follows:

A. PROCEDURAL BACKGROUND

1. On June 5, 2024, Plaintiff Aaron Hackman ("Plaintiff") filed his Complaint ("Complaint") in this action In The Circuit Court of the Seventeenth Judicial Circuit in and for Broward County, Florida, Case No. 24-SC-35805 ("State Court Action"). Plaintiff alleges violations of the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681, *et seq.*, against Defendants.

2. Equifax was served with Plaintiff's Summons and Complaint on July 18, 2024. A copy of the State Court Complaint is attached hereto as **Exhibit A**. This Notice of Removal is being filed with the thirty-day (30) time period required by 28 U.S.C. § 1446(b).

B. GROUND FOR REMOVAL

3. The present suit is an action over which the United States District Court for the Southern District of Florida, Ft. Lauderdale Division, has original jurisdiction pursuant to 28 U.S.C. § 1331, as it is a civil action founded on a claim or right arising under the laws of the United States. This civil action may be removed to this Court by Equifax pursuant to the provisions of 28 U.S.C. § 1446(b). Removal is proper because Plaintiff's claims present a federal question. 28 U.S.C. §§ 1331 and 1441(a). In the Complaint, Plaintiff seeks damages for Defendants' alleged violations of the Federal Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.*

C. COMPLIANCE WITH PROCEDURAL REQUIREMENTS

4. Pursuant to 28 U.S.C. § 1441(a), venue of the removal action is proper in the United States District Court for the Southern District of Florida, Ft. Lauderdale Division, because it is in the district and division embracing the place where the state court action is pending.

5. In accordance with 28 U.S.C. § 1446(a), a copy of all executed process, pleadings asserting causes of action, and orders in the State Court Action served upon Defendant Equifax are attached hereto as **Exhibit B**.

6. Promptly after the filing of this Notice of Removal, Equifax shall give written notice of the removal to the Plaintiff and will file a copy of this Notice of Removal with the Circuit Court of the Seventeenth Judicial Circuit in and for Broward County, Florida, as required by 28 U.S.C. § 1446(d).

WHEREFORE, Equifax respectfully prays that the action be removed to this Court and that this Court assume full jurisdiction as if it had been originally filed here.

Dated: August 15, 2024

Respectfully submitted,

SQUIRE PATTON BOGGS (US) LLP

By: /s/ Jason Daniel Joffe
Jason Daniel Joffe
Florida Bar No. 0013564
200 S. Biscayne Blvd., Suite 3400
Miami, FL 33131
Telephone: (305) 577-7000
Facsimile: (305) 577-7001
Email: jason.joffe@squirepb.com
*Counsel for Defendant Equifax
Information Services LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing document has been filed via the CM/ECF filing system this August 15, 2024, which will serve an electronic Notice of Filing to all registered users. I further certify that a copy of the foregoing document was provided to the counsel listed below via email transmission:

Bridget L. Scarangella, Esq.
Seraph Legal, P.A.
Email: BScarangella@seraphlegal.com
Counsel for Plaintiff

/s/ Jason Daniel Joffe
Jason Daniel Joffe